

METROPOLITAN POLICE AUTHORITY
LOCAL GOVERNMENT EQUALITY STANDARDS

DOCUMENT ANALYSIS
INTERIM REPORT

FIRST DRAFT
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Focus
CONSULTANCY LTD



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1.0 INTRODUCTION

The Metropolitan Police Authority has commissioned Focus Consultancy Limited to conduct an Equality and Diversity Audit in order to assist the MPA in achieving Levels one and two of the Local Government Equality Standards.

This document aims to highlight the key issues that have arisen out of the analysis of written documentation provided by the MPA. This analysis is part of a broader audit process for reviewing the extent to which equality and diversity are integral processes and features of the organisation's business and goals. This analysis will also identify the evidence base for verifying the status of the MPA in relation to the five levels of the Local Government Equality Standards.

A list of the documents analysed is appended to this report. (Appendix A).

2.0 KEY FINDINGS

Through close analysis of the documentation there are several issues and recommendations that can be made.

The Metropolitan Police Authority (MPA) has clearly signalled its public commitment to equality and diversity and this is evident in a number of documents analysed.

There is a clear commitment to involve local communities, particularly minority communities and those considered 'hard to reach' at various levels of the MPA's work. Examples of this include HR 1, the 'Diversity Awareness Programme Development' guide for senior managers, HR 29, the Head of Community Engagement Application Pack which also includes the Consultation Strategy and Implementation Plan 2002/2005 and HR 15, Guide to Community Involvement in Police Training)

That commitment also extends to ensuring that both civilian staff and members of the police forces are sensitive to diversity and EO issues, both with respect to internal relations as well as relations with communities with which the MPA is working. Particular emphasis is given to training for senior managers (see HR 12, Senior Management Team Self-Assessment Questionnaire within the MPA as well as HR 1, the Diversity Awareness Programme Development, which is targeted at senior management). However, HR 7, 13, 14, 16 and 17 demonstrate that there is also a strong commitment to training lower-level staff as well as giving them the opportunity to comment about the treatment of diversity and EO issues within the MPA.

2.1 PRIORITY AREAS

Although diversity and the MPA's equal opportunity policy issues have been integrated into some documents, further efforts to mainstream diversity and equal opportunity issues still remain crucial. Some possible examples include the following:

- Although the Staff Handbook (HR 27) devotes significant attention to explaining the MPA's EO (Equal Opportunities) policy, more attention could be given to mainstreaming the equality and diversity issues throughout other sections of the staff handbook. For example, in section 2.4 ('Promotion') no mention is made of employees' right and managers' responsibility not to discriminate in giving promotions. Likewise, in section 2.5, diversity training is not mentioned under 'Relevant Subject Areas' for training.
- In the MPA's policy on annual leave, public and privilege holidays (HR 8 and also included in HR 29), although implicit, there is no mention of annual leave for non-Christian holidays employees of different faiths (which, if included, might help mainstream cultural sensitivity).
- The Staff Handbook also includes reference to the MPA's Equal Pay Policy (sect. 5.1), including a description of the policy itself as well as how the MPA implements said policy (through use of the 'Hay' job evaluation procedure which seeks to 'identify the job weights of work being carried out by both men and women'). No mention, however, is made of whether a similar procedure

- is implemented with regards to analysing whether the principle of equal pay is likewise applied with regard to race, ethnicity, etc. or those with a disability.
- The MPA is clear on the legislative frameworks that underpin equality policies, however, this need to be mainstreamed within the documents in order to promulgate their importance to staff.
 - The employment of Impact Assessment techniques are clearly stated and in many cases have been carried out (see consultation day document 23rd March), however, these assessments need to be mainstreamed for all three equality strands and applied to all policies.
 - The MPA shows a real commitment to racial equality and awareness; it is also strong on gender. Disability is perhaps the least mainstreamed strand.
 - As mentioned the beginnings of a comprehensive set of equality policies are taking shape. Most are still in draft format and when they are completed they need to be made accessible to all employees, either through training, appraisal systems or inductions.
 - The MPA offers coherent reference to the organisational structure responsible for implementation of the equality issues, however, the commitment of resources are rarely mentioned and these are essential for completing levels one and two in their full capacity.

2.2 GENDER AND DISABILITY

In addition to increased mainstreaming of diversity and equal opportunity issues, another area for improvement might include giving the same level of prominence to gender and disability issues as has been given to the need to fight discrimination by race and ethnicity. As mentioned above disability is the least mainstreamed equality strand. Examples of this include HR 1, the Diversity Awareness Programme Development for senior managers which aims 'to provide a comprehensive framework to assist those planning a community contribution to police training courses' (p. 1). Although there is occasional mention of gender and disability sensitivity issues, the main focus is on incorporating awareness training about racial and ethnic discrimination. Likewise, the main focus of the Equal Opportunities

section in the Staff Handbook is racial and ethnic discrimination. Although discrimination according to gender and disability are mentioned, increased emphasis would communicate to readers of the handbook that the MPA is as committed to fighting gender and disability discrimination as it is to racial and ethnic discrimination.

3.0 CONCLUSION

Lastly, it is clear from an analysis of the documents that the MPA, at least in writing, is fully committed to diversity and promoting equal opportunities issues. What is less clear, however, is whether this public commitment is followed by specific actions to improve its current standing, other than including inclusion in policy documents. Examples of some positive steps being taken include the workshop in which MPA staff was given the opportunity to express their view about EO and diversity issues within the organization (see HR 7) and the use of the 'Hay', although controversial, evaluation procedure in analysing the degree to which female MPA employees are being paid fairly in comparison to their male counterparts (see HR 27, Staff Handbook).

The diversity training given to some staff (including senior managers) is also a most commendable initiative that is evidence of this positive approach. However, there was no explicit or clear evidence of to what degree the MPA follows through with the commitment it has made on paper. For example, one of the complaints made by MPA staff with regard to treatment of diversity and equal opportunities issues within the Authority was that there was more rhetoric than actual action. Relevant questions for the MPA to address are: "What use was made of HR 7, the document describing the perspectives expressed by the staff during the workshop? Was HR 7 circulated among senior staff? Did HR 7 lead to a change in MPA policies surrounding diversity and equal opportunities issues? With regard to efforts to incorporate local communities into the work of the MPA, to what extent has this been successful?"

In general, many of the documents include a general reference to diversity and EO issues but do not provide specific details on how EO policies are relevant and/or applicable (eg. HR 3, the Dignity and Respect Policy statement, mentions discrimination generally as part of the policy; it would be helpful to give a more thorough definition of what is defined as 'discrimination' such as 'with regard to race, ethnicity, gender, etc'). Furthermore, many of the EO policies are in draft format and are under consultation. Whilst consultation is a valuable and important mechanism, these documents need to be accessible to all staff to ensure thorough mainstreaming of equality issues.

It is hoped that the semi-structured interviews planned will, on completion, unearth more documentary evidence to address the initial findings of this report. The focus of these interviews will also provide a more specific evidence base in relation to the key themes of Level one of the Local Government Standards.

APPENDIX A

DOCUMENTATION ANALYSED

The documents covered by this report are as follows:

- MPA Race Equality Scheme
- Women's Equality Policy -Draft for Consultation
- Draft for Consultation MPA Race Equality and Diversity Policy 2003
- Draft Corporate Equality Value Statement
- MPA Equal Opportunity and Diversity Value Statements and Action
- Race Equality Scheme Consultation Day 23rd March 2004: Delegates Information Pack
- MPA Internal Audit Annual Report 2002/ 03
- Internal Audit Progress Report December 2003
- HR 1, Diversity Awareness Programme Development
- HR 2-- Indemnity Cover
- HR 3, Dignity and Respect Policy statement
- HR 4. 'In the Matter of the Metropolitan Authority Transfer Scheme, 2000'
- HR 5, Terms and Conditions of MPA Support Staff
- HR 6, Tender to the MPA for the Provision of Diversity Training
- HR 7, Emerging Findings from Diversity Training Focus Groups among MPA staff
- HR 8, Annual leave, public and privilege holidays
- HR 9, A briefing note by the MPA support organisation
- HR 10, Memo re: HR 9 to all chairs and deputy chairs
- HR 11, Race Relations (Amendment) Act
- HR 12, Senior Management Team Self-Assessment Questionnaire
- HR 13, Cultural Awareness Development Questionnaire
- HR 14, MPA Diversity Theatre Scenarios
- HR 15, Guide to Community Involvement in Police Training-- Consultation Draft

- HR 16, Diversity Training Research Overview
- HR 17, Valuing Diversity Workshop
- HR 18, Pay and Overtime (from Staff handbook)
- HR 19, Developing People, Performance Management
- HR 20, Other Conditions of Service, Attendance
- HR 21, staff employment policies (e.g., working hours, pension, etc.)
- HR 22, Outline on Flexible Working Hours Policy
- HR 23, Maternity Provisions
- HR 24, Terms and Conditions of MPA Support Staff
- HR 25, Occupational Health Referral Form
- HR 26, Appraisal Form
- HR 27, Staff Handbook
- HR 28, Head of Security & Review, Application Pack
- HR 29, Head of Community Engagement Application Pack
- HR 30, Independent Members For Police Misconduct Panels